

EXHIBIT B

IN THE SUPERIOR COURT OF BUTTS COUNTY
STATE OF GEORGIA

MICHAEL SCOTT ROLAND,)	
)	
Plaintiff,)	CIVIL ACTION
vs.)	
)	FILE NO.
KEARA A. RAMOS, STEVENS)	
TRANSPORT, INC., ABC)	
CORPORATIONS 1-3, and JOHN DOE 1-)	
3,)	
)	JURY TRIAL DEMANDED
Defendants.)	


 Morgan V. Ward, Clerk
 Butts County, Georgia

COMPLAINT AND DEMAND FOR TRIAL BY JURY

COMES NOW Plaintiff MICHAEL SCOTT ROLAND, and states his complaint against Defendants KEARA A. RAMOS; STEVENS TRANSPORT, INC.; ABC CORPORATIONS 1-3 and JOHN DOE 1-3 as follows:

PARTIES AND JURISDICTION

1.

Plaintiff MICHAEL SCOTT ROLAND is a resident of the State of Georgia.

2.

Defendant KEARA A. RAMOS is the driver of the 2019 Peterbilt tractor trailer involved in the subject collision and is a resident of the State of Pennsylvania whose last known address is 318 E Marshall Street, Norris Town, Pennsylvania 19401-5031. As a non-resident motorist operating a vehicle within the territorial limits of the State of Georgia, Defendant may be served through the Secretary of State under O.C.G.A. § 40-12-1 and § 40-12-2. This Court has long-arm personal jurisdiction on this defendant through O.C.G.A. § 9-10-91.

3.

Defendant STEVENS TRANSPORT, INC., (herein “Stevens”) is a for-profit, foreign corporation with its principal place of business located at 9757 Military Parkway, Dallas, Texas 75227. As a non-resident motor carrier operating a vehicle within the territorial limits of the State of Georgia, Defendant may be served through the Secretary of State under O.C.G.A. § 40-1-117 through their chairman and Chief Executive Officer, Steve L. Aaron. This Court has long-arm personal jurisdiction on this defendant through O.C.G.A. § 9-10-91.

4.

The true names or capacities of the Defendants named herein as ABC CORPORATIONS 1-3 and JOHN DOE 1-3 are unknown to the Plaintiff. Therefore, Plaintiff sues these Defendants by their fictitious names. Plaintiff will amend the Complaint to show the true names of these Defendants when their names have been ascertained.

5.

Defendants are joint tortfeasors, and therefore venue is proper in Butts County, Georgia.

COUNT I NEGLIGENCE- KEARA A. RAMOS

6.

Plaintiff re-alleges and incorporates herein by reference paragraphs 1 through 5 above as if the same were restated herein verbatim.

7.

On February 7, 2022, Plaintiff MICHAEL SCOTT ROLAND was driving his 2013 Ford LGT CONVTNL F-150 traveling in a prudent and careful manner, eastbound on Highway 36 East, at its intersection with Short Road in the City of Jackson, Butts County, Georgia.

8.

At or about that same time, Defendant Ramos was driving a 2019 Peterbilt tractor trailer traveling northbound on Short Road at its intersection with Highway 36 East in the City of Jackson, Butts County, Georgia when she negligently, recklessly, carelessly and unlawfully operated said vehicle so as to cause it to collide with the Plaintiff's vehicle.

8.

At all relevant times, Defendant Ramos owed certain civil duties to Plaintiff, and, notwithstanding those duties, the Defendant did violate them in the following particulars:

- a. In failing to make reasonable and proper observations while driving Defendant's 2019 Peterbilt tractor trailer or, if reasonable and proper observations were made, failing to act thereon;
- b. In failing to yield to right of way traffic in violation of O.C.G.A. § 40-6-70;
- c. In failing to make timely and proper application of its brakes in violation of O.C.G.A. § 40-6-241;
- d. In failing to observe or undertake the necessary precautions to keep the 2019 Peterbilt tractor trailer from colliding with the Plaintiff's vehicle in violation of O.C.G.A. § 40-6-390;
- e. In driving the 2019 Peterbilt tractor trailer without due caution and circumspection and in a manner so as to endanger the person and/or property of others in the immediate vicinity in violation of O.C.G.A. § 40-6-241;
- f. In driving the 2019 Peterbilt tractor trailer in reckless disregard for the safety of persons and/or property in violation of O.C.G.A. § 40-6-390; and,
- g. In committing other negligent and reckless acts and omissions as may be shown by the evidence and proven at trial.

9.

Defendant Ramos's violations of the aforementioned statutory duties of care constitute negligence and *negligence per se*.

10.

As a direct and proximate result of the aforesaid negligence and breaches of duty by Defendant Ramos, Plaintiff MICHAEL SCOTT ROLAND suffered substantial injuries and damages including medical and other necessary expenses, mental and physical pain and suffering due to the injuries to his body and nervous system, personal inconvenience, plus an inability to lead a normal life. As a result of the subject collision, Plaintiff MICHAEL SCOTT ROLAND has incurred past medical expenses, and will incur medical expenses into the future.

COUNT II NEGLIGENCE- STEVENS TRANSPORT, INC.

11.

Plaintiff re-alleges and incorporates herein by reference paragraphs 1 through 10 above as if they were fully restated herein verbatim.

12.

At all times relevant on February 7, 2022, Defendant Ramos was an employee or agent of STEVENS TRANSPORT, INC., and was driving the 2019 Peterbilt tractor trailer within the course and scope of her employment or agency relationship with Stevens. Defendant Stevens Transport, Inc. is/are liable for the negligent acts and omissions of Defendant Ramos as an agent and/or employee of Stevens at the time of the accident.

13.

Defendant Stevens is/are responsible for the acts and omissions of Defendant Ramos pursuant to *respondeat superior*.

14.

Defendant Stevens negligently hired, retained, and supervised Defendant Ramos.

15.

Defendant Stevens negligently entrusted the 2019 Peterbilt tractor trailer to Defendant Ramos when they knew or should have known that its driver was incompetent or unfit to perform the duties given to the driver by the company.

16.

As a direct and proximate result of the aforesaid negligence and breaches of duty by Defendant Ramos, Plaintiff MICHAEL SCOTT ROLAND suffered substantial injuries and damages including medical and other necessary expenses, mental and physical pain and suffering due to the injuries to his body and nervous system, personal inconvenience, plus an inability to lead a normal life. As a result of the subject collision, Plaintiff MICHAEL SCOTT ROLAND has incurred past medical expenses and will incur medical expenses into the future.

17.

By reason of the foregoing, Plaintiff is entitled to recover compensatory damages from the Defendant Stevens' negligent hiring and retention in an amount to be proven at trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays and demands as follows:

(a) That Process and Summons issue, as provided by law, requiring Defendants to appear and answer Plaintiff's Complaint;

(b) That service be had upon Defendants as provided by law;

(c) That Plaintiff have and recover general damages from such Defendants, as the jury deems are liable to Plaintiff, and in such an amount as the jury deems just and appropriate to

fully and completely compensate Plaintiff for all of her injuries and pain and suffering, mental, physical, and emotional, past, present, and future;

(d) That Plaintiff have and recover from Defendants, special damages for past and future medical expenses and loss of income in the past and future in such an amount as shall be proven at trial;

(e) That this matter be tried to a jury;

(f) That all costs be cast against the Defendants;


(g) For such other and further relief as this Court deems just and appropriate.

This 28th day of June 2022.

/s/ Laura Sidwell Maki

Laura Sidwell Maki
Attorney for Plaintiff
Georgia Bar No.: 257756

Morgan and Morgan Atlanta, PLLC
191 Peachtree Street NE, Suite 4200
Atlanta, GA 30303
Phone: (404) 965-8811
Fax: (404) 965-8812
LMaki@Forthethepeople.com

 **EFILED IN OFFICE**
CLERK OF SUPERIOR COURT
BUTTS COUNTY, GEORGIA
2022-SU-V-0213
WILLIAM A. FEARS
JUL 19, 2022 12:17 PM

IN THE SUPERIOR COURT OF BUTTS COUNTY

STATE OF GEORGIA


Morgan V. Ward, Clerk
Butts County, Georgia

MICHAEL SCOTT ROLAND,

*

*

Plaintiff,

*

CIVIL ACTION FILE NO.

*

2022-SU-V-0213

*

vs.

*

*

**KEARA A. RAMOS, STEVENS
TRANSPORT, INC., ABC
CORPORATIONS 1-3, AND JOHN
DOE 1-3,**

*

*

*

*

*

Defendants.

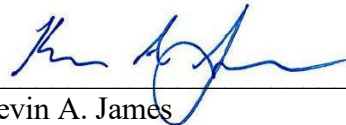
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*

DEMAND FOR TRIAL
BY JURY OF TWELVE

COMES NOW State Farm Mutual Automobile Insurance Company and demands trial of
this action by jury of twelve.

This 19th day of July, 2022



Kevin A. James
GA Bar No. 193637
Attorney for State Farm

GROTH, MAKARENKO, KAISER & EIDEX, LLC
335 Peachtree Industrial Boulevard
Suite 2206
Suwanee, Georgia 30024
(770) 904-3590
(678) 730-7541 fax
kj@gmke.law

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel of record in the foregoing matter with the attached **Demand for Trial by Jury of Twelve** by e-filing and/or depositing a copy of the same in the United States Mail in an envelope with sufficient postage thereon addressed as follows:

Laura Sidwell Maki
Morgan and Morgan Atlanta, PLLC
191 Peachtree Street NE, Suite 4200
Atlanta, GA 30303
LMaki@forthepeople.com

This 19th day of July, 2022.



Kevin A. James
GA Bar No. 193637
Attorney for State Farm

GROTH, MAKARENKO, KAISER & EIDEX, LLC
335 Peachtree Industrial Boulevard
Suite 2206
Suwanee, Georgia 30024
(770) 904-3590
(678) 730-7541 fax
kj@gmke.law

**SUPERIOR COURT OF BUTTS COUNTY
STATE OF GEORGIA**

FILED IN OFFICE
CLERK OF SUPERIOR COURT
BUTTS COUNTY, GEORGIA
2022-SU-V-0213
WILLIAM A. FEARS
JUN 28, 2022 12:21 PM

Morgan V. Ward

Morgan V. Ward, Clerk
Butts County, Georgia

CIVIL ACTION NUMBER 2022-SU-V-0213

Roland, Michael Scott

PLAINTIFF

VS.

Ramos, Keara A.
Stevens Transport, Inc.

DEFENDANTS

SUMMONS

TO: RAMOS, KEARA A.

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**Laura S. Maki
Morgan & Morgan
191 Peachtree Street
P.O. Box 57007
Atlanta , Georgia 30343**

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 28th day of June, 2022.

Clerk of Superior Court

Morgan V. Ward

Morgan V. Ward, Clerk
Butts County, Georgia

**SUPERIOR COURT OF BUTTS COUNTY
STATE OF GEORGIA**

FILED IN OFFICE
CLERK OF SUPERIOR COURT
BUTTS COUNTY, GEORGIA
2022-SU-V-0213
WILLIAM A. FEARS
JUN 28, 2022 12:21 PM

Morgan V. Ward

Morgan V. Ward, Clerk
Butts County, Georgia

CIVIL ACTION NUMBER 2022-SU-V-0213

Roland, Michael Scott

PLAINTIFF

VS.

Ramos, Keara A.
Stevens Transport, Inc.

DEFENDANTS

SUMMONS

TO: STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**Laura S. Maki
Morgan & Morgan
191 Peachtree Street
P.O. Box 57007
Atlanta , Georgia 30343**

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 28th day of June, 2022.

Clerk of Superior Court

Morgan V. Ward

Morgan V. Ward, Clerk
Butts County, Georgia

**SUPERIOR COURT OF BUTTS COUNTY
STATE OF GEORGIA**

FILED IN OFFICE
CLERK OF SUPERIOR COURT
BUTTS COUNTY, GEORGIA
2022-SU-V-0213
WILLIAM A. FEARS
JUN 28, 2022 12:21 PM

Morgan V. Ward

Morgan V. Ward, Clerk
Butts County, Georgia

CIVIL ACTION NUMBER 2022-SU-V-0213

Roland, Michael Scott

PLAINTIFF

VS.

Ramos, Keara A.
Stevens Transport, Inc.

DEFENDANTS

SUMMONS

TO: STEVENS TRANSPORT, INC.

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**Laura S. Maki
Morgan & Morgan
191 Peachtree Street
P.O. Box 57007
Atlanta , Georgia 30343**

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 28th day of June, 2022.

Clerk of Superior Court

Morgan V. Ward

Morgan V. Ward, Clerk
Butts County, Georgia

General Civil and Domestic Relations Case Filing Information Form

CLERK OF SUPERIOR COURT
BUTTS COUNTY, GEORGIA☒ Superior or ☐ State Court of Butts County**2022-SU-V-0213**

WILLIAM A. FEARS

JUN 28, 2022 12:21 PM

For Clerk Use Only

Date Filed 06-28-2022Case Number 2022-SU-V-0213

MM-DD-YYYY

*Morgan V. Ward*Morgan V. Ward, Clerk
Butts County, Georgia

Plaintiff(s)

Roland, Michael Scott

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Plaintiff's Attorney Maki, Laura S.

Defendant(s)

Ramos, Keara A.

Last First Middle I. Suffix Prefix

Stevens Transport, Inc.

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Bar Number 257756Self-Represented ☐

Check one case type and, if applicable, one sub-type in one box.

General Civil Cases

- ☒ Automobile Tort
- ☐ Civil Appeal
- ☐ Contract
- ☐ Contempt/Modification/Other Post-Judgment
- ☐ Garnishment
- ☐ General Tort
- ☐ Habeas Corpus
- ☐ Injunction/Mandamus/Other Writ
- ☐ Landlord/Tenant
- ☐ Medical Malpractice Tort
- ☐ Product Liability Tort
- ☐ Real Property
- ☐ Restraining Petition
- ☐ Other General Civil

Domestic Relations Cases

- ☐ Adoption
- ☐ Contempt
- ☐ Non-payment of child support, medical support, or alimony
- ☐ Dissolution/Divorce/Separate Maintenance/Alimony
- ☐ Family Violence Petition
- ☐ Modification
- ☐ Custody/Parenting Time/Visitation
- ☐ Paternity/Legitimation
- ☐ Support – IV-D
- ☐ Support – Private (non-IV-D)
- ☐ Other Domestic Relations

- ☐ Check if the action is related to another action(s) pending or previously pending in this court involving some or all of the same parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number

Case Number

- ☒ I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in O.C.G.A. § 9-11-7.1.

- ☐ Is a foreign language or sign-language interpreter needed in this case? If so, provide the language(s) required.

Language(s) Required

- ☐ Do you or your client need any disability accommodations? If so, please describe the accommodation request.

SHERIFF'S ENTRY OF SERVICE

2/2022 FILED IN OFFICE

CLERK OF SUPERIOR COURT

BUTTS COUNTY, GEORGIA

2022-SU-V-0213

WILLIAM A. FEARS

JUL 13, 2022 10:29 AM

COUNTY

Morgan V. Ward

Morgan V. Ward, Clerk
Butts County, GeorgiaSuperior Court ☒State Court ☐Juvenile Court ☐Magistrate Court ☐Probate Court ☐

Georgia, BUTTS

ROLAND, MICHAEL SCOTT

Civil Action No. 2022-SU-V-0213

Date Filed 06/28/22 12:21 PM

Attorney's Address Maki, Laura S.
Morgan & Morgan
191 Peachtree Street
P.O. Box 57007
Atlanta, GEORGIA 30343-

Plaintiff

VS.
RAMOS, KEARA A.; STEVENS TRANSPORT INC.,

Name and Address of Party to be Served.
State Farm Mutual Automobile Insurance Company

Defendant

Garnishee

SHERIFF'S ENTRY OF SERVICE

PERSONAL

☐ I have this day served the defendant personally with a copy of the within action and summons.

NOTORIOUS

I have this day served the defendant by leaving a copy of the action and summons at his most notorious place of abode in this County.

CORPORATION

☐ Delivered same into hands of described as follows:
age, about years; weight pounds; height, about feet and inches, domiciled at the residence of defendant.

Served the defendant State Farm Mutual Automobile Insurance Company, a corporation
☐ by leaving a copy of the within action and summons with Alisha Smith in charge of the office and place of doing business of said Corporation in the County.

TACK & MAIL

☐ I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of the same in the United States Mail, first class in an envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.


NON EST

☐ Diligent search made and defendant not to be found in the jurisdiction of this court.

This 7 day of July, 2022

Sgt. Collins, SO 500
Deputy

RECEIVED
JUL 13 5 PM '22
CLERK OF SUPERIOR COURT
BUTTS COUNTY, GEORGIA

 **EFILED IN OFFICE**
CLERK OF SUPERIOR COURT
BUTTS COUNTY, GEORGIA
2022-SU-V-0213
WILLIAM A. FEARS
JUL 19, 2022 12:17 PM

IN THE SUPERIOR COURT OF BUTTS COUNTY

STATE OF GEORGIA


Morgan V. Ward, Clerk
Butts County, Georgia

MICHAEL SCOTT ROLAND,

*

*

Plaintiff,

*

CIVIL ACTION FILE NO.

*

2022-SU-V-0213

*

vs.

*

*

KEARA A. RAMOS, STEVENS

*

TRANSPORT, INC., ABC

*

CORPORATIONS 1-3, AND JOHN

*

DOE 1-3,

*

*

Defendants.

*

*

ANSWER ON BEHALF OF STATE FARM MUTUAL
AUTOMOBILE INSURANCE COMPANY

NOW COMES State Farm Mutual Automobile Insurance Company, hereinafter ("State Farm"), by and through the undersigned attorney, and responds to Plaintiff's Complaint as follows:

First Defense

Plaintiff's Complaint should be dismissed for all the legal grounds set forth in O.C.G.A. §9-11-12(b), including, but not limited to (1) Lack of jurisdiction over the subject matter; (2) Lack of jurisdiction over the person; (3) Improper venue; (4) Insufficiency of process; (5) Insufficiency of service of process; (6) Failure to state a claim upon which relief can be granted; (7) Failure to join a party under Code Section 9-11-19.

Second Defense

Plaintiff's failure to plead special damages sought in this action bars their recovery pursuant to O.C.G.A. § 9-11-9(g).

Third Defense

Plaintiff's Complaint should be dismissed for all the legal grounds set forth in O.C.G.A. § 9-11-8(c), including but not limited to: accord and satisfaction, arbitration and award, discharge in bankruptcy, duress, estoppel, failure of consideration, fraud, illegality, injury by fellow servant, laches, license, payment, release, res judicata, statute of frauds, statute of limitations, and waiver.

Fourth Defense

State Farm denies that Defendant is an uninsured or underinsured motorist, as defined by Georgia Law and further denies the provisions of O.C.G.A. § 37-7-11.

Fifth Defense

Plaintiff has failed to comply with conditions precedent in recovering from their uninsured motorist carrier.

Sixth Defense

Responding specifically to the allegations contained in the Plaintiff's Complaint, State Farm responds as follows:

1.

State Farm is without knowledge sufficient to either admit or deny the allegations contained in paragraph 1 of Plaintiff's Complaint; therefore, State Farm denies this allegation.

2.

State Farm is without knowledge sufficient to either admit or deny the allegations contained in paragraph 2 of Plaintiff's Complaint; therefore, State Farm denies this allegation.

3.

State Farm is without knowledge sufficient to either admit or deny the allegations contained in paragraph 3 of Plaintiff's Complaint; therefore, State Farm denies this allegation.

4.

State Farm is without knowledge sufficient to either admit or deny the allegations contained in paragraph 4 of Plaintiff's Complaint; therefore, State Farm denies this allegation.

5.

State Farm is without knowledge sufficient to either admit or deny the allegations contained in paragraph 5 of Plaintiff's Complaint; therefore, State Farm denies this allegation.

6.

State Farm is without knowledge sufficient to either admit or deny the allegations contained in paragraph 6 of Plaintiff's Complaint; therefore, State Farm denies this allegation.

7.

State Farm is without knowledge sufficient to either admit or deny the allegations contained in paragraph 7 of Plaintiff's Complaint; therefore, State Farm denies this allegation.

8.

State Farm is without knowledge sufficient to either admit or deny the allegations contained in paragraph 8 of Plaintiff's Complaint; therefore, State Farm denies this allegation.

9.

State Farm is without knowledge sufficient to either admit or deny the allegations contained in paragraph 9 of Plaintiff's Complaint; therefore, State Farm denies this allegation.

10.

State Farm is without knowledge sufficient to either admit or deny the allegations contained in paragraph 10 of Plaintiff's Complaint; therefore, State Farm denies this allegation.

11.

State Farm is without knowledge sufficient to either admit or deny the allegations contained in paragraph 11 of Plaintiff's Complaint; therefore, State Farm denies this allegation.

12.

State Farm is without knowledge sufficient to either admit or deny the allegations contained in paragraph 12 of Plaintiff's Complaint; therefore, State Farm denies this allegation.

13.

State Farm is without knowledge sufficient to either admit or deny the allegations contained in paragraph 13 of Plaintiff's Complaint; therefore, State Farm denies this allegation.

14.

State Farm is without knowledge sufficient to either admit or deny the allegations contained in paragraph 14 of Plaintiff's Complaint; therefore, State Farm denies this allegation.

15.

State Farm is without knowledge sufficient to either admit or deny the allegations contained in paragraph 15 of Plaintiff's Complaint; therefore, State Farm denies this allegation.

16.

State Farm is without knowledge sufficient to either admit or deny the allegations contained in paragraph 16 of Plaintiff's Complaint; therefore, State Farm denies this allegation.

17.

State Farm is without knowledge sufficient to either admit or deny the allegations contained in paragraph 17 of Plaintiff's Complaint; therefore, State Farm denies this allegation.

18.

State Farm is without knowledge sufficient to either admit or deny the allegations

contained in paragraph 18 of Plaintiff's Complaint; therefore, State Farm denies this allegation.

CROSS-CLAIM

COMES NOW, State Farm Mutual Automobile Insurance Company and files this cross-claim against Defendants showing the Court as follows:

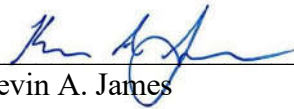
1.

If any Defendant(s) is an uninsured or underinsured motorist, and if State Farm is required to pay or satisfy any judgment to Plaintiff by reason that Defendant(s) is/are uninsured or an underinsured motorist, then pursuant to O.C.G.A. § 33-7-11, State Farm is by law entitled to judgment over and against such Defendant(s).

WHEREFORE, State Farm Mutual Automobile Insurance Company prays:

- a) For six months to complete discovery;
- b) For a trial by jury;
- c) For judgment over and against Defendants for all amounts it may be required to pay to Plaintiff as a result of this action; and
- d) For such other and further relief as the Court deems just and proper.

This 19th day of July, 2022.



Kevin A. James
GA Bar No. 193637
Attorney for State Farm

GROTH, MAKARENKO, KAISER & EIDEX, LLC
335 Peachtree Industrial Boulevard
Suite 2206
Suwanee, Georgia 30024
(770) 904-3590
(678) 730-7541 fax
kj@gmke.law

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel of record in the foregoing matter with the attached Answer of Defendant by e-filing and/or depositing a copy of the same in the United States Mail in an envelope with sufficient postage thereon addressed as follows:

Laura Sidwell Maki
Morgan and Morgan Atlanta, PLLC
191 Peachtree Street NE, Suite 4200
Atlanta, GA 30303
LMaki@forthepeople.com

This 19th day of July, 2022.



Kevin A. James
GA Bar No. 193637
Attorney for State Farm

GROTH, MAKARENKO, KAISER & EIDEX, LLC
335 Peachtree Industrial Boulevard
Suite 2206
Suwanee, Georgia 30024
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kj@gmke.law